

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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MARY PHILLIPA SLEDGE, MARY  
JANE PIDGEON SLEDGE TRUST, and  
PIDGEON SLEDGE FAMILY LIMITED  
PARTNERSHIP,

Plaintiffs,

v.

Case No. 2:13-cv-2578-STA-cgc

INDICO SYSTEM RESOURCES, INC. and  
CLEAL WATTS, III,

Defendants.

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**RENEWED MOTION TO WITHDRAW COUNSEL AND INCORPORATED  
MEMORANDUM IN SUPPORT**

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Come now Bruce McMullen, Lori Patterson, and Mary Wu of Baker, Donelson, Bearman, Caldwell & Berkowitz, PC (“Baker Donelson”) renew their Motion to this Court to withdraw as attorneys of record in this matter and to be removed from receiving electronic notices of filings in this case through the ECF system.

This Court has ordered that Defendants secure new counsel by May 14, 2015. (D.E. 57.) The time has passed for Defendants to file a Motion to Substitute Counsel, and Defendants have not done so. Pursuant to this Order of the Court, Baker Donelson was granted leave to file a renewed motion to withdraw if Defendants have not filed a motion to substitute counsel by this date. Baker Donelson states that Defendants have and continue to fail to fulfill their obligations to Baker Donelson, and additional conflicts have arisen therefore withdrawal of Baker Donelson as counsel of record for Defendants is warranted.

Pursuant to Local Rule 83.5, the following is the name, last known address, and last known telephone number of Defendant Watts: Cleal Watts, 8926 Forest Hills Blvd., Dallas, Texas 75281-4001, 214-659-2197. Indico System Resources, Inc. is listed at the same address.

WHEREFORE, PREMISES CONSIDERED, Baker Donelson moves this Court to allow Baker Donelson to withdraw as attorneys of record in this lawsuit.

**REQUEST FOR HEARING**

Pursuant to Order, D.E. 57, this Court stated that it would set a hearing on Baker Donelson's renewed Motion. Baker Donelson renews their request for a hearing on their motion to withdraw.

Respectfully Submitted,

BAKER DONELSON BEARMAN  
CALDWELL & BERKOWITZ, PC

/s Bruce McMullen

Bruce A. McMullen (#18126)

Lori Patterson (# 19848)

Mary Wu (#31339)

165 Madison Ave, Suite 2000

Memphis, Tennessee 38103

(901) 526-2000

[bmcmullen@bakerdonelson.com](mailto:bmcmullen@bakerdonelson.com)

[lpatterson@bakerdonelson.com](mailto:lpatterson@bakerdonelson.com)

[mwu@bakerdonelson.com](mailto:mwu@bakerdonelson.com)

*Attorneys for Defendants*

### **CERTIFICATE OF CONSULTATION**

Though Baker Donelson was granted leave to file a renewed motion by the Court making the consultation requirement unnecessary, Bruce McMullen nonetheless called Darrell Phillips to see if they would consent to this renewed motion. Counsel for Plaintiffs indicated that they could not consent to the Motion.

s/ Bruce McMullen

Bruce A. McMullen

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 15th day of May, 2015, a copy of the foregoing was electronically filed and served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party:

Darrell N. Phillips  
Pietrangelo Cook PLC  
6410 Poplar Avenue, Suite 190  
Memphis, TN 38119  
901-685-2662

and

Cleal Watts  
8926 Forest Hills Blvd.  
Dallas, TX 75218

s/ Bruce McMullen

Bruce A. McMullen